IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

PHILIP GODLEWSKI, :

Plaintiff,

:

v. : 3:24-CV-00344-JKM

Judge Julia K. Munley

EDUARDO NICOLAS ALVEAR

GONZALEZ a/k/a ALVEAR GONZALEZ : EDUARDO NICOLAS a/k/a NICOLAS : ALVEAR, and GOOD LION TV, LLC, :

Defendant.

REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANT EDUARDO NICOLAS ALVEAR GONZALEZ a/k/a ALVEAR GONZALEZ EDUARDO NICOLAS a/k/a NICOLAS ALVEAR

COMES NOW Plaintiff Philip Godlewski ("Godlewski") by and through his counsel, Kolman Law, PC, and makes the following Request:

- 1. Godlewski commenced this matter by filing a Complaint (Doc. 1) on February 28, 2024.
- 2. Godlewski made service of original process upon Defendant Eduardo Nicolas Alvear Gonzalez a/k/a Alvear Gonzalez Eduardo Nicolas a/k/a Nicolas Alvear ("Defendant Alvear Gonzalez") on March 4, 2024. (Doc. 3)
- 3. Per Fed.R.Civ.P. 12(a)(1)(A)(i), Defendant Alvear Gonzalez was obligated to file an answer within 21 days of the date of service of the original process.
- 3. Defendant Alvear Gonzalez has not filed an answer within the time required by Fed.R.Civ.P. 12(a)(1)(A)(i).
 - 3. Defendant Alvear Gonzalez is in default.

- 4. Defendant Alvear Gonzalez is neither an infant nor incompetent.
- 5. Defendant Alvear Gonzalez is not in military service. See affidavit of Military/NonMilitary Service attached hereto as Exhibit 1.
 - 7. Fed.R.Civ.P. 55(a) permits entry of default judgment.

WHEREFORE, Plaintiff Philip Godlewski respectfully requests that the Clerk enter a default against Defendant Eduardo Nicolas Alvear Gonzalez a/k/a Alvear Gonzalez Eduardo Nicolas a/k/a Nicolas Alvear.

DATE: March 27, 2024

Respectfully submitted,

KOLMAN LAW, P.C.

/s/ Timothy M. Kolman

Timothy M. Kolman 51982

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Attorneys for Plaintiff.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have, this 27th day of March 2024, served a true and correct copy of the foregoing document via the Middle District of Pennsylvania CM/ECF system upon the following:

Ryan P. Campbell, Esquire Dave W. Rothenberg, Esquire Counsel for Defendants.

Timothy A. Bowers, PA77980

This document has also been filed electronically and is available for viewing and downloading from the ECF system.